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March 22, 2023

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) pursuant to the Court’s March 13, 2023 Order requesting that the parties identify the number of experts each side intends to challenge on *Daubert* grounds. *See* ECF No. 8923.

Saudi Arabia intends to file an omnibus *Daubert* motion seeking to exclude the opinions of four of the seven experts disclosed by the Plaintiffs’ Executive Committees. Saudi Arabia further proposes the following page limits for the parties’ *Daubert* briefs: 70 pages for opening briefs; 70 pages for oppositions; and 35 pages for replies.

In challenging only four of Plaintiffs’ seven experts in its omnibus *Daubert* motion, Saudi Arabia expressly reserves the right to challenge the opinions offered by Plaintiffs’ other three experts on any grounds at other stages in the litigation, including in Saudi Arabia’s renewed motion to dismiss.

Defendant Dallah Avco has informed us that it does not plan to file its own *Daubert* motion but expects to join Saudi Arabia’s motion as appropriate. Saudi Arabia has attempted to meet and confer with Plaintiffs about the above proposal, but Plaintiffs have not provided their position.

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Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)